

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

BEAUMONT CHAPTER OF THE NAACP and  
JESSICA DAYE,

Plaintiffs,

v.

JEFFERSON COUNTY, TEXAS, JEFFERSON  
COUNTY COMMISSIONERS COURT, LAURIE  
LEISTER, in her official capacity as the JEFFERSON  
COUNTY CLERK, and MARY BETH BOWLING, in  
her official capacity as the PRESIDING JUDGE OF  
THE JOHN PAUL DAVIS COMMUNITY CENTER,

Defendants.

Civil Action No. 22 Civ. 488

**DECLARATION OF JEFF HOMRIG IN SUPPORT OF PLAINTIFFS' EMERGENCY  
MOTION FOR A TEMPORARY RESTRAINING ORDER TO WAIVE LOCAL RULE  
CV-7(h)**

I, JEFF HOMRIG, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the below is true and correct:

1. I made a good faith effort to contact Defendants the morning of November 7, 2022 using their last known email addresses (including that of the County Clerk) prior to commencing this action to provide notice of the forthcoming application seeking immediate injunctive relief. I noted that I will be sending the filed versions of the documents upon commencement along with any details with respect to judicial assignment and the timing of any hearing on the request for a temporary restraining order.

2. I respectfully request a waiver of the meet and confer requirement under Local Rule CV-7(h), given the timing and urgency for getting relief prior to Election Day on November

8 and the irreparable harm that would result in the absence of more immediate relief (as set out in greater detail in the accompanying papers which are incorporated herein by reference).

Respectfully submitted on November 7, 2022

s/ Jeff Homrig  
Jeff Homrig